

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,
L.L.C., CONTRARIAN CAPITAL FUND I,
L.P., CONTRARIAN DOME DU GOUTER
MASTER FUND, LP, CONTRARIAN
CAPITAL SENIOR SECURED, L.P.,
CONTRARIAN EM II, LP, CONTRARIAN
EMERGING MARKETS, L.P., POLONIUS
HOLDINGS, LLC, and CONTRARIAN
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel.
Nos. 19 Civ. 3123 & 18 Civ.
11940]

Hon. Analisa Torres

NOTICE OF MOTION FOR A STAY

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, dated July 13, 2020, Defendant Bolivarian Republic of Venezuela (“the Republic”), by and through its undersigned counsel, move the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order staying this case pursuant to the Court’s inherent authority and international comity, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE THAT, in accordance with the June 1, 2020 Scheduling Order entered in these actions, ECF No. 59, Plaintiffs’ reply in support of their motion for summary judgment and Plaintiffs’ opposition to Defendant’s motion for a stay are to

be filed by July 27, 2020; and Defendant's reply in support of its motion for a stay is to be filed by August 10, 2020.

Dated: July 13, 2020
New York, New York

Respectfully submitted,

/s/ Joseph E. Neuhaus

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